

THE
ADVERTISING
STANDARDS
AUTHORITY
Eighth Report

1 APRIL 1970 — 31 MARCH 1971

CONTENTS

	Page
List of Members of the Authority	2
Secretary and address of the Authority	2
Complaints	2
Chairmanship of the Authority	3
Review of the five years 1965-70... ..	4
II Report of the Council	12
A. Changes in and interpretation of the British Code of Advertising Practice	12
B. Investigation of advertisements and action relating to alleged breaches of the Code	14
C. The Law and the Courts	21
D. International	24
E. Guidance	24
Message from Lord Drumalbyn	25
Appendix: Details of Members of the Authority	26

THE ADVERTISING STANDARDS AUTHORITY LTD

Chairman

THE RT. HON. LORD TWEEDSMUIR, C.B.E., C.D., LL.D.

Members

A. CHARLES BUCK
R. CRAIG-WOOD
LIONEL MURRAY
MRS. J. FORT
SIR JOHN HAWTON, K.C.B.
BRIAN F. MACCABE, M.C.
MRS. G. L. S. PIKE, C.B.E., J.P.
R. M. SHIELDS
HOWARD THOMAS, C.B.E.
THE HON. C. M. WOODHOUSE, D.S.O., O.B.E., M.P.

All members serve as individuals and not as representatives of any
industry or trade or professional association

Secretary and Registered Office:

JOHN C. BRAUN

1 Bell Yard, London, WC2A 2JX

Telephone: 01-242 4111

COMPLAINTS

Any member of the public may complain to the Authority about any particular advertisement.

There are no forms to be completed and no set rules of procedure. All that is required is a letter of explanation, together with a copy of the advertisement to which exception is taken.

Complaints by telephone will not be acted upon unless they are subsequently confirmed in writing.

Anonymous letters are ignored.

Complaints should be sent to the above address.

The Eighth Report of THE ADVERTISING STANDARDS AUTHORITY

1 APRIL 1970-31 MARCH 1971

Chairmanship of the Authority

1 The Rt. Hon. Lord Drumalbyn, PC relinquished the chairmanship of the Authority in October 1970 upon his appointment as Minister without Portfolio. He was succeeded at the end of March 1971 by The Rt. Hon. Lord Tweedsmuir, CBE, CD, LLD.

2 Because of the sudden call of Lord Drumalbyn to high government office, an interval necessarily elapsed before the appointment of his successor at the end of the Authority's year, so this report is in two parts. Part I is a review of the five years of progress made under the leadership of Lord Drumalbyn. Part II is a report by the Council on the activities of the past year.

3 The Council wishes to place on record its great appreciation of the unremitting work done by Lord Drumalbyn during his term of office during which he accomplished so much in applying and developing the voluntary system, thereby enhancing the prestige of the Authority.

REVIEW OF THE FIVE YEARS 1965-1970

4 With Lord Drumalbyn's departure, the moment seems opportune to survey the Authority's development over the five years of his Chairmanship. This has been a period when the Authority's supervisory role in the British system of self-regulatory advertising control has been consolidated, and its influence both within and outside the advertising industry extended and enhanced.

5 This brief retrospect does not set out to rehearse in detail the events of those years but concentrates rather on the broad lines of development and the main issues of policy that fell to be decided during the period.

Establishment of the Authority

6 The Authority had come into existence as a result of the advertising industry's desire, expressed at the Advertising Association's Conference in 1961, to submit itself to the overriding authority of a body on which there would be a majority of members with no stake in the industry. In that same year, the various sectors of the industry, advertisers, media and agencies, contrived with the Advertising Association to bring together for the first time the various strands of self-regulatory activity that had developed over the preceding half century. A single committee reflecting all these interests was set up to administer a Code of Advertising Practice which they all agreed to observe.

7 Thus was set up what has come to be known as a tri-partite, two-tier system of voluntary control of advertising.

Administration improved

8 When Lord Drumalbyn became Chairman, he saw the importance of establishing an appropriate relationship with the Code of Advertising Practice Committee. This was greatly facilitated by the decision to amalgamate the Secretariats of the Authority and the C A P Committee, a step taken in September 1965. An effective interchange of views and information was thus assured, and was further helped by the C A P Committee's invitation to the Authority's Chairman to attend its monthly meetings so that, in his direction of the Authority, he could be fully informed as to the views of the constituent organisations of the Committee.

9 It was at this time too that the joint secretariat, which had become, as it remains, the hub of the Advertising Control System, moved to its own premises entirely separate from, but within easy reach of the offices of, the Advertising Association and its Advertising Investigation Department with which in particular the Authority's links are very close.

10 With good lines of communication established between the two bodies, it proved possible to draw a clearer distinction between their complementary functions. As Lord Drumalbyn saw it, the Authority's prime responsibility was, as it remains, to supervise in the public interest the working of the industry's internal system of self regulation. The C A P Committee's function was and is the administration of its Code and the co-ordination of the disciplinary working of the system. Jointly the two bodies keep the Code in line with constantly changing conditions and attitudes, improving and supplementing it where and when necessary. There is a constant dialogue between the two bodies with a view to reaching practical solutions which meet the interests of both the public and industry. The basic principle is that once the issues have been fully examined, effect is given to the Authority's decisions. The task of making the Code known to, and handling complaints from, the public lies with the Authority, while the Committee deals with these matters within the industry.

The public interest

11 The Authority early declared its belief that the main contribution it could make was to bring to bear on the system of self-discipline in advertising a balanced view of the public interest, including the special interests of both consumers and producers. On these foundations, the Authority was able to erect certain other general principles which have guided its work and defined its sphere of action over the period under review. These may be summarised here.

Political advertising

12 First is the Authority's attitude to political advertising. The Authority has consistently taken the view that political advertising in the press is a matter for individual editors and not for the voluntary system to control. In part this attitude is based upon its belief that in a democracy the greatest possible degree of freedom within the law should be accorded to expressions of political opinion and exhortations to political action; but the Authority also recognises the practical impossibility of applying an objective standard of judgment to political argument. The Authority believes, however, that political advertisements should be immediately distinguishable from editorial opinion and should clearly identify their sponsors.

Trading standards

13 Secondly, the Authority has interpreted its terms of reference to exclude interference in the area of what may conveniently be described as trading standards. While the Authority is prepared to look behind the advertisement so as to ensure that, for example, mail order suppliers do refund money to dissatisfied customers, this being an obligation upon them under the Code, it has not seen its role as a general retail ombudsman with responsibility for such matters as the quality, desirability or availability of goods where the advertising is not at fault.

Naming of names

14 A decision that the Authority has observed from its earliest days, and despite considerable external pressure, is that of withholding the names of advertisers and agencies who break the rules. Most breaches of the Code are minor and few of these intentional; to publish the names of the advertisers would involve a loss of goodwill quite disproportionate to the offence and to the public benefit which might accrue. Moreover the Authority is convinced that no self-disciplinary system can work unless all concerned are prepared freely to supply information; the ready compliance which now exists would disappear, the Authority believes, without the assurance that informants will not be pilloried.

Links with other bodies

15 Its relationships within the industry being firmly established and its sphere of activity thus progressively being defined, the Authority set about creating links with outside bodies. The Molony Committee of 1962 had already given its "cautious endorsement" to the setting up of the Authority and throughout its existence close links have been maintained with the Board of Trade and its successor the Department of Trade and Industry. Lord Drumalbyn's ministerial experience in the Board of Trade, prior to his appointment, greatly facilitated and expanded this area of fruitful co-operation which was of particular assistance during the period of consultation which preceded the enactment of the Trade Descriptions Act in 1968.

16 A friendly relationship was also developed with the Consumer Council, itself a product of the Molony Committee's recommendations. Initially the Council had taken the view that the Authority "was not in a position to judge objectively the impact of some types of advertising on the ordinary public". In a letter to *The Times* in March 1966 Lord Drumalbyn rejected the Council's view. It certainly was not the case that the funding or the composition of the Authority did anything to impair its independence of judgment, but neither, more importantly, could the Authority accept that the Consumer Council, merely by virtue of its existence, was more competent to identify and defend the public interest insofar as it might be affected by advertising. The specific suggestion in the course of which the Consumer Council's remark was made, viz. the need for a more comprehensive and thorough system of monitoring, was accepted by the Authority which had already set on foot moves towards that end. Finally the Authority welcomed the opportunity for co-operation with the Council in matters of mutual concern, and from this grew the participation of representatives of the control system in the Joint Committee on Consumer Complaints on which representatives also of newspaper reader services, Weights and Measures

authorities, consumer bodies and others continue to co-operate in the handling of matters of joint concern. This initiative is in line with the Authority's often repeated belief that "consumer protection" as such is less necessary than co-operation between suppliers, customers and regulatory authorities of all kinds with the joint aim of ensuring fair trading and good practice. A truth which never suffers from repetition is that the honesty and propriety of advertising is as important for the prosperity and prestige of trade and industry as it is for the well being of the consuming public.

Co-operation with Weights and Measures Inspectorate

17 It is in this context too that the Authority's relationship with Weights and Measures inspectors developed. The Trade Descriptions Act 1968 imposed on Weights and Measures authorities a positive duty to enforce its provisions within their areas. Doubts were expressed during the passage of this measure through Parliament as to the wisdom of placing upon officials trained in the precise factual skills of weighing and measuring, the added burden, calling for a wholly different approach of taking the broader and more flexible view appropriate to a measure dealing with the way in which descriptions of goods and services are likely to be taken by the public. This unease was increased by the fact that the duty of enforcement was laid individually upon some 240 authorities varying widely in size, structure and approach. The problems which this structure entails for advertisers of widely distributed products needs no emphasis and it was generally accepted at an early stage that some degree of co-operation both between the statutory and voluntary authorities and between statutory authorities themselves would be highly desirable. While even now it cannot be claimed that this ideal has been attained, one of the most heartening aspects of the Authority's work over the years both in the gestation and in the operation of the Act has been the readiness of the Institute of Weights and Measures Administration, to which most Chief Officers belong, to give all help within its power, and of the great majority of weights and measures inspectors throughout the country to adopt a positive, helpful and co-operative attitude towards the problems of advertisers and those of the control system at large.

Trade Descriptions Act

18 In the event, the effect of the Trade Descriptions Act 1968 on advertising has in fact been singularly small. This is no doubt due to the Code already having required higher and more comprehensive standards from advertisers than were imposed by the Act. As Lord Drumalbyn said, in the Seventh Report, "The myth current at the time when the statute was before Parliament, that there was something seriously amiss with advertising in the press and on television seems to have been largely based either on a mistaken belief that the main function and purpose of advertising was to provide a public information service rather than to act as a selling tool, or else on examples of

abuses which occurred in the 1950s, often in other countries." and "At point of sale, however, the effect of the Act has been considerable. This was inevitably an area over which the voluntary system had less authority than in the field of press and outdoor advertising. The great majority of prosecutions that have come to the Authority's attention related to three matters—offences under section 11 which deals with price, false descriptions at the point of sale, and offences concerned with the sale of second-hand cars, such as false indications of mileage or repairs. None of these come within the sphere of the Authority except in the comparatively rare case where the offence at point of sale was in some way linked with an advertisement."

Other legislation

19 Other statutes which called for consideration by the Authority during the period under review were the Medicines Act 1968, which in time will have a considerable effect on Part B of the Code, dealing with the advertising of medicines, treatments and appliances; and the Race Relations Act 1968, section 6 of which, with its imperfection in drafting, has given rise to some curious anomalies in advertising for persons with special skills but of specific nationalities. The Authority is in full agreement with the Race Relations Board on this latter statute.

A growing advisory role

20 The last five years have reflected a growing activity on the part of the Authority in an advisory role in addition to its supervisory responsibilities in relation to the Code. Advertisers and advertising agencies, trade associations and other bodies, as well as members of the public, have come to see the Authority and the C A P Committee with their expertise of law and Code interpretation, as bodies to whom they can turn for help and guidance before they fall foul of statute or Code, and this recognition has added a new dimension to the structure as a whole. It may well be said that the Authority is now the apex of an advisory and control system for advertising. It has not been our purpose to set out in detail the matters dealt with over the period under review—these can be studied in the separate reports published each year. It is, however, apposite to mention some of the issues which have been tackled and to comment on the extent to which they still present problems.

Advertising in the guise of editorial

21 Throughout the existence of the Authority, one of the areas of complaint against advertising has been its disguise as editorial matter. Within the last five years, by dint of advice and warning, and the re-writing of the specific part of the Code—now paragraph 11—most publications are sufficiently well aware of the rule to see to it that paid-for advertising space is not used in such a way as to make it appear to be a vehicle for editorial opinion.

Guarantees

22 The fight against the 'bad' guarantee—one which limits or takes away the common law or statutory rights of a purchaser—has been waged with some success. While such guarantees cannot be said to be part of advertising, the rule has been that they may not be advertised. This inhibition has had the result, in several cases, of unacceptable guarantees being so modified that they have become of value to a purchaser, and so permitted to be referred to in advertisements.

Betting tipsters

23 A particularly irritating field of complaint five years ago was that of betting tipster advertising. Some of these beguiling appeals were too frequently the subject of complaint from the cognoscenti of the turf. They were misleading in the riches they offered and in the bases upon which such promises were made. They were also very difficult to control, and it was only after much study and with the co-operation of the racing press that a formula was found whereby these advertisements could be made acceptable.

Pregnancy testing advertisements

24 The history of the advertising of pregnancy testing services is an interesting example of the Authority's independence of thought and the flexibility of the control system. When in October 1965 the Authority accepted a recommendation of the C A P Committee and ruled that advertisements for pregnancy testing should not be accepted in the general press, it was not realised to what extent a useful service was being denied to women. On representations being made, a thorough study was made and despite the contrary views of the then Ministry of Health, the British Medical Association and the Pharmaceutical Society, the rule was rescinded in August 1966 so that these advertisements were permitted in the general press at the discretion of publishers, subject to a number of safeguards and a prescribed form of advertisement.

Breath testing devices

25 The Authority's awareness of its responsibility to the public was demonstrated in another area when the breath testing device was introduced as a weapon against drunken drivers. As soon as it became apparent that do-it-yourself testing devices would be advertised for sale to members of the public, and that they might be a hazard and lead to self-deception, the Authority issued a warning that such devices could only be advertised under the strictest conditions. It was also ruled that no advertisements should be accepted for products which purported to mask the effect of alcohol in tests on drivers.

Rules on prices and sales

26 Before the Trade Descriptions Act came into force, the Authority and the C A P Committee agreed together on a number of rules and interpretations

aimed at eliminating some malpractices which might not be caught by the Act. Thus rules were issued warning against the use of misleading price comparisons in terms which were not far from the wording of section 11 of the Act; misuse of the words "wholesale" and "wholesaler" was condemned and a set of rules drawn up to deal with sales advertisements, particularly the 'one day' sale, and what had become a source of complaint, the inadequate publicising of commission charges in certain stores and at specialised sales.

Franchise schemes

27 A particularly successful exercise has been the control of the advertising of franchise schemes. A franchise scheme is defined in C A P Bulletin No. 7 as one where a company, firm or individual gives to a person the right, often exclusive, to sell specified products or services in a defined geographical area, or premises, in return for an initial payment and/or percentage of profits (or royalty). As such schemes seemed to provide opportunities to mislead and even defraud, it seemed advisable to subject them to a rigorous screening process by media and the Advertising Investigation Department. The procedure devised and brought into force by the C A P Committee has been most effective and the Authority is satisfied that what might have been a field for exploitation has been maintained as a legitimate trading activity.

Inertia selling

28 In one area, the efforts of the Authority to achieve results through the voluntary action of industry have been overtaken by statutory intervention. During the past five years strenuous efforts were made to deal with the mischief known as inertia selling and kindred sales methods. The practice itself is the sending of goods which have not been ordered in the hope that the recipient will be willing to pay for them or to return them to the sender. The Authority first got to grips with the problem when the practice was defined and condemned in a statement issued in April 1966. A rule was introduced into the Code and remains in the current edition. A more complete study and explanation, together with guidance for traders was issued by the Authority in November 1969 and is reproduced as Appendix C in the Seventh Report. Before this guidance had time to take full effect, and there is little evidence that real inertia selling is widespread, a Private Member's Bill was introduced (see p. 23).

Consumer promotions and competitions

29 Premium offers and competitions have been under continuous study by the Authority over the last five years because of numerous complaints from the public. Both these activities come more within the wider area of sales promotion than advertising as such, but as they are usually brought to the notice of the public by advertisements they have come within our purview. It is sufficient to say that a guidance leaflet on both subjects was published by the Authority in October 1968. Further study led to the publication of a revised

leaflet in September 1970 entitled "Premium Offers and related consumer promotions". The response to this indicates that the advice given by the Authority is being widely sought both in this country and abroad. The uncertainties and anomalies surrounding competitions can only be resolved by a thorough overhaul of the statutes relating to betting, gaming and lotteries and it is gratifying to know that this has been promised by the Home Office.

The changing view of "knocking copy"

30 The Authority has also been concerned over the period, largely in its supervisory role, with comparative and denigratory advertising, formerly known by the more familiar expression, "knocking copy". While this may prejudicially affect the consumer when it is misleading, it is usually a matter of greater concern to competitors. In order to clarify the areas of contention the old "knocking copy" rule was divided into two parts, thus bringing the rule on comparisons in line with descriptions and claims, making them subject to substantiation and stating that they should not be misleading; and having a separate rule on denigration, which states that advertisements should not unfairly attack or discredit other products or advertisements. There being no law of unfair competition as such in this country, the Code rule bridges one of the gaps between British and European law in this field.

World reputation of the British system

31 One of the most striking advances made during the last five years has been in the reputation of the British system of voluntary control of advertising throughout the world. Its balance and its position vis-à-vis the statutory system, both in television and in the wider field of commercial and criminal law have made it admired and respected as an example which is being adapted to the particular situations of other countries. Complementary as it is to the International Code of Advertising Practice of the International Chamber of Commerce, the British Code is drawn upon by other voluntary control systems in many parts of the world. The Authority believes that the conception of the two-tier, tri-partite system is one which can be adapted wherever there is a free competitive economy and a combination of advertisers, agencies and media. The more countries that work to a common system, the greater the advantage will be to international trade.

32 Concluding this retrospective survey of five years under the chairmanship of Lord Drumalbyn, the Authority sees its position as the accepted apex of the advertising control system, working in harmony with the C A P Committee and with the confidence of the public. The formative years have passed; the structure is sound; the field of co-operation is wide. With the firmest of foundations laid, the Authority is well set to spread its influence further and to see to it that the standards of advertising in this country remain what we believe them to be—the highest in the world.

REPORT OF THE COUNCIL

Membership

In April 1970, Mr. Victor Feather tendered his resignation because of the onerous nature of his duties as General Secretary of the Trades Union Congress. The Council records its warm appreciation of the help and good counsel accorded to it by Mr. Feather during his membership of the Authority, which he joined at its inception.

Mr. Lionel Murray, Assistant General Secretary of the Trades Union Congress, was appointed a member of the Authority in April 1970. A note on the members of the Authority is given in the Appendix.

Meetings

The Council of Management, consisting of all members of the Authority, has met nine times during the year.

Premises

The Authority moved its premises at the end of March 1971 to 1 Bell Yard, London, WC2A 2JX, on the expiration of the lease of 5 Clement's Inn.

Activities of the Authority

The activities of the Authority are reviewed under the following headings:

	<i>Page</i>
A. Changes in and interpretations of the British Code of Advertising Practice	12
B. Investigation of advertisements and action relating to alleged breaches of the Code	14
C. The Law and the Courts	21
D. International	24
E. Guidance	24

A. CHANGES IN AND INTERPRETATION OF THE BRITISH CODE OF ADVERTISING PRACTICE

33 Fourth Edition of the Code

The fourth edition of the Code, which had just been issued at the time when the last report of the Authority was published, has been widely distributed throughout the advertising industry and beyond. Copies have been sent to all Weights and Measures Authorities, Chambers of Commerce, Chambers of Trade and to many libraries, educational establishments, trade associations and consumer organisations. The Code has also been distributed to bodies specially interested throughout the world and reproduced in several educational and instructional books.

One of the problems within the industry is to ensure that the Code is made available to, and is read and understood by, everybody engaged in the preparation and publication of advertisements at all levels. The changing personnel in the industry makes this difficult. Nevertheless, the Authority very much hopes that the industry will pay continuous attention to the problem, see that copies of the Code are widely available, kept up to date, and used.

34 C A P Bulletins

One C A P Bulletin was published during the year in September 1970. In addition to the items mentioned below, the bulletin consolidated and superseded the previous C A P Bulletins New Series 1-6. 23 items remain for continuing guidance.

35 Mortgage Broker Advertising

Complaints from members of the public and concern on the part of consumers' organisations led the Advertising Investigation Department of the Advertising Association, on behalf of the C A P Committee, to draw up a set of rules governing advertisements for persons acting as mortgage brokers or their agents. The main causes of complaint were discrepancies between the terms advertised and the terms of the actual loan agreement; non-disclosure of certain onerous requirements; unfair selectivity in the publication or non-disclosure of charges and fees; and various other points all of which were covered in the rules. The appropriate trade and professional bodies and the Consumer Council were consulted before the rules were published and the Authority is pleased to report that hardly any complaints are now being received in this field. The ready co-operation of media in putting the rules into effect stresses once again the strength and value of the self-disciplinary system.

36 Portrayal of living persons in advertisements

Because of accumulating evidence of the portrayal of, or reference to, living persons in advertisements without their consent, the Authority and the C A P Committee thought it proper to rule that such portrayal was contrary to good advertising practice. At the same time the opportunity was taken to remind the industry of the Lord Chamberlain's advice concerning the depiction of members of the Royal Family in advertisements.

37 Use of designation "Nurse" in advertising

Representations from the nursing profession led to an investigation into the misuse of the term "dental nurse" in advertisements. As a result a ruling was made advising against the use of that expression to describe unqualified persons who assist dentists with their work in the surgery. Advertisers requiring such help have been advised to use the term recommended by the British Dental Association, namely "Dental Surgery Assistant".

B. INVESTIGATION OF ADVERTISEMENTS AND ACTION RELATING TO ALLEGED BREACHES OF THE CODE

38 Investigation

The Authority secretariat and the Advertising Investigation Department of the Advertising Association in its role as an arm of the advertising control system have had a full year of work. Once again, much of their attention has been centred on mail order and premium offers—investigating complaints, obtaining money back or goods for those complainants who have received neither one nor the other and helping advertisers and their agencies to eliminate the root causes of complaint.

39 Franchise Schemes

During the year it became apparent that more evidence was required of the financial background and bona fides of some operators coming from overseas and the questionnaire procedure referred to on p. 10 was tightened up to meet the situation. One of the important new criteria is the requirement that, as the sphere of operation of franchises is limited to Great Britain as part of the contract, the law of this country must apply; forms of agreement containing clauses that they are to be interpreted according to the law of other countries or to individual states in America are not acceptable. It is hoped by these measures to forestall the trouble which has been experienced in other countries.

40 Monitoring

The operation over the last three years of the monitoring unit of A I D has provided confirmation that the large bulk of advertising in this country conforms to the Code. Examination of some 16,300 issues of newspapers, periodicals and magazines during the past year has revealed that the proportion of breaches to issues examined is under one half of 1%. This steadily reducing rate over the period during which the exercise has been carried out shows that the Code has become increasingly understood and acted upon by advertisers and their agencies, large and small, throughout Great Britain and that the vigilance of media is being maintained at a high level. It has been gratifying to note that attention to 'fringe' publications has resulted in a number of publishers being introduced to the working of the Code machinery, and the acceptance by more advertisers of its advisory services.

The next phase of monitoring will be the examination in depth of specific product fields, particularly those which are prone to breaches of the Code. The first of such fields is health food advertising.

41 Cases dealt with during the year

Although there has been an increase in the number of cases dealt with during

the year, the total being 221, it will be seen that this figure is swollen by 38 complaints which were received concerning a single mail order company. More is said of this on page 16.

As has been pointed out in previous reports, the following tables do not include requests for guidance, comment, or questions of interpretation. Nor do they include matters dealt with by the C A P Committee or its sponsoring organisations.

42 Cases during period 1 January to 31 December, 1970

Advertisements amended or withdrawn	23
Advertisements suspended	3
Complaints not substantiated	23
Complaints withdrawn or not proceeded with	6
Complaints satisfied by delivery of goods or refund of money	107
Mistakes by advertiser; corrective action taken	28
Satisfactory explanation given by advertiser	1
Outside purview of the Authority	6
No trace of advertiser	2
Advertiser no longer trading	4
Warnings	16
Outstanding at end of year	2
	<hr/>
	221
	<hr/>
Misleading claims, offers or descriptions	44
Inaccurate price claims or comparisons	8
Unsatisfactory guarantee or operation of guarantee	2
Mail order infringements	113*
Advertisements in editorial style	3
Premium Offers	21
Matters of Taste	13
Denigration	6
Advertisements addressed to children	2
Betting Tipsters	1
Competitions	1
Faulty administration	3
Faulty goods or services, not attributable to advertising	2
Refusal to publish an advertisement	1
Mortgage brokers	1
	<hr/>
	221
	<hr/>

*38 relate to one company

43 Mail Order Advertising—Paragraph 14 of the Code

As stated in para. 41 above, there has been a sharp rise in the number of complaints under Paragraph 14 of the Code—Mail Order Advertising—to the extent that they represent more than half of the total number received by the

Authority. Of the 113 complaints, 38 referred to a single company which subsequently went into liquidation. The history of this episode is worth some attention because it illustrates at one and the same time the difficulties facing the control system—indeed, any system—and the considerable success in recovering monies properly due to complainants. The national newspapers which carry a very large amount of “bargain space” or “Saturday square” advertising have a special committee to deal with it and the complaints arising therefrom. When the number of complaints reaches a certain point, the advertiser is warned and, if the complaint rate does not abate, a recommendation is made for non-acceptance of further advertisements. That is what happened in the particular case under review. Despite this bar, the advertiser was able to continue to attract custom by sending catalogues through the post, and most of the complaints which reached the Authority concerned non-delivery of goods ordered through the catalogue. Each complaint was referred to the company and money was refunded to the complainant. Arrangements were made to visit and inspect the premises and organisation of the company when information was received that it was going into liquidation, an event which swiftly followed.

Another mail order company, against which complaints have been made from time to time, claimed that it had reorganised its administration and was employing an effective computer system which could cope adequately with the demands put upon it. The authority was invited to see over the premises in order to satisfy itself as to the improvements which had been made. No further complaints have been received concerning this particular company.

These experiences have persuaded the Authority that although the actual content of mail order advertisements is, for the most part, unexceptionable, there is need for closer scrutiny of the administrative arrangements made to deal with the follow-up in order for section 14 of the Code to be fully implemented.

The Authority is conscious of the need for maintaining the right perspective in this field. It is therefore only fair to add that despite the figures disclosed in this report, there is no evidence to indicate that the percentage of complaint to turnover in the whole mail order field is any higher than in the retail trade as a whole. The greater part of business done gives no cause for complaint and, indeed, provides a service to a wide public.

44 Misleading claims, offers and descriptions—Paragraph 2 of the Code

The second most numerous class of complaint in 1970 was that broadly covered by the description “misleading claims, offers or descriptions”. In the nature of things each complaint in this class tends to differ from its fellows more than is the case with regard to complaints about, for example, mail order suppliers. Complaints about misleading advertisements, moreover, bring the Authority’s influence into areas far removed from the mass market consumer goods which are the normal subject of “advertising” so far as the public is

concerned. Thus during the year the Authority sought amendment of an advertisement addressed to civil engineering contractors for a piece of equipment which would help them, it was claimed, "Keep within the new Regulations". No governmental or professional regulations had in fact been issued which would require such equipment to be bought. What the advertiser had had in mind was the growing practice of highway authorities including terms in their contracts in complying with which their equipment might well be useful. He readily agreed to amend his advertisement when the possibility of confusion was pointed out.

Another recondite area which called for the Authority's attention was that of the forwarding agent. A complaint was received from an exporter who claimed that an agent offering daily despatches to Italy was not in fact prepared to send smaller consignments daily unless there were sufficient of them to make up a whole lorry load. Again an appropriate amendment was arranged, this time with the media owner's co-operation.

An area of more general interest which had, however, never come to the Authority's attention before was involved in a complaint against a New Town Corporation. The complainant alleged that in the house plans included in brochures sent to those considering living there, the Corporation had marked a space, "pram". His child's pram was too large to fit the space and he thought that the same would be generally true. With the assistance of the British Baby Carriage Manufacturers' Association, the Authority was able to say that the complainant's belief was unfounded. The space would have been capable of housing the great majority of prams manufactured in this country. A simple indication of this kind could not be taken as meaning that any pram of any size could be accommodated, but only the likely use of the space by the average occupier.

The majority of cases, of course, concern more typical advertising claims, of which the claim by an advertiser to outsell his competitor is a common one. In such cases the Authority calls upon the advertiser to substantiate his claim. Often it is not possible for him to do this with complete accuracy, but the Authority is usually able to distinguish between those claims which patently exceed the evidence and those which in all probability represent the truth of the situation. In judging such disputes, between competitors particularly, the Authority enjoys the advantage of an informal method of approach and confidential information from both sides, without having to disclose any more of the latter than is necessary to explain its rulings. In some advertisements the omission of information may be as misleading as the provision of inaccurate information. Thus mushroom spawn was sold in a pack which said, "Everybody can grow . . .". Inside the pack and too late to return it, the buyer discovered that "everybody" could only grow mushrooms from the spawn if fresh horse manure was available in quantity. The pack was discovered to be an old one. New packs did not make the same mistake.

The effect of the omission of vital information is illustrated in a different

context by a complaint concerning a large bookmaker, who ran both betting shops and a credit betting service. The latter service had a higher limit for payouts on accumulator bets than did the betting shops and it was this which was featured in advertisements. With the assistance of A I D, the Authority arranged that where the credit betting limit was featured, future advertisements would make clear that such limits applied only to credit customers.

On occasion the Authority is concerned because the public appears to misconstrue the whole nature of an advertiser's proposition. Thus a promotion by a large grocery chain was drawn to the Authority's attention. On entering shops in the chain, customers were offered envelopes. These contained most often halves of coupons with various denominations from five shillings to £100. If, on a subsequent visit, one obtained the corresponding half coupon, one was entitled to claim the sum indicated on the coupon. Legally such schemes are generally considered to be acceptable and the rules were quite explicit as to the mode of operation. But it became quite clear that the general public understanding was that there existed a corresponding half for each half coupon in circulation. Such was not in fact the case. The proportion of winning to other halves, even of 5/- coupons was very low and it got lower as the nominal value of the coupon increased. Since the advertising was not misleading, it was beyond the power of the Authority to do any more than point out to the advertiser the need for greater clarity.

45 Premium Offers

As promised in last year's report, the Authority revised its original leaflet on this subject and published a more comprehensive guidance paper under the heading, "Premium Offers and related consumer promotions". This paper had a very wide circulation both in this country and abroad, and was soon so much in demand that a reprint became necessary. It is to be hoped that the drop in complaints from 35 last year to 21 in this report is an indication that the guidance is being followed. Manufacturers should no longer print on the back, and therefore hidden, part of labels, vital terms of or limitations on the offer of premiums. We would like to stress two particular points made in the guidance paper. First, an offer may be described as "free" only in those cases where the applicant is required to pay for nothing other than actual postage or carriage; not, for example, for packing, handling or administration costs. And second, promoters of premium offer schemes should know that more annoyance is caused by inefficient handling of complaints than by the original grounds of complaints themselves.

The complaints received during the year were of much the same kind as in the preceding year, namely delays in and non-delivery of the premiums owing to underestimation of demand; closing dates and restrictive conditions printed on the backs of labels; ignoring or brushing off legitimate complaints; and misleading statements as to value of the premium.

46 Taste and decency

Although the Authority itself received fewer complaints from the public this year on matters of taste and decency, the C A P Committee has been paying close attention to trends in advertising which may lead to unfavourable criticism. Two pages of the last report were devoted to this aspect of what was described as offensive advertising. The Authority feels that a recapitulation of its attitude is worthwhile. It does not interpret its responsibilities for supervision as requiring or entitling it to act as a censor of morals or as an arbiter of taste. Its role is rather one of watching the general level of taste in each sector of advertising, in the interest of the public and of advertising as a whole, in relation to what is currently considered fitting and acceptable. There is, for instance, no real problem about nudity, which is portrayed in so many aspects in the editorial columns of the press and on cinema and TV screens that the use of the naked body in advertisements is relatively insignificant. It is in the area of suggestiveness, double meaning and smut that some advertisements affront public sensibility and, as a result, bring advertising itself into disrepute and lower its standards. The Authority has not, however, found evidence to show that offence is so widespread to suggest a general decline in standards; it expects that, on the whole, advertisers will continue to be guided by their wish to attract, and not to offend, potential customers.

The advertising of films is a sensitive area where earlier warnings need to be repeated. Some single advertisements may offend some people; a group of such advertisements together may well give offence to many more people. Here the responsibility of publishers becomes more marked.

The public outcry made in 1969 about certain books of a sexual nature which were advertised on a large scale through the post, on a somewhat indiscriminate basis, echoed through 1970 in Parliament and elsewhere. This was reflected in the clause dealing with circulars advertising books of this kind which was added to the Unsolicited Goods and Services Bill (see p. 23) during its passage through the House of Commons. The Authority was glad to learn of the steps taken by the Direct Mail Producers Association to deal with mailings of a controversial nature by the introduction of a speedy pre-publication checking system. While the control procedure can necessarily apply only to members of the Association, the sense of responsibility shown should be taken as an example by others.

Other aspects of lapses in taste can be shown by the following examples:

A professional man complained of embarrassment caused by receipt in his office of a box labelled with the advertiser's name and the legend "Formula X pills for speedy relief from ailments of the reproductive system"; the box contained two aspirins and an advertisement for a copying machine. When the Authority took the matter up with them, the advertisers apologised for the offence caused by what they had intended as a humorous mailing shot, and agreed not to use this approach again.

A member of the public complained about the use of the phrase "Love thy

neighbour" in a deodorant advertisement. The agency felt that this was an untypical reaction but agreed that the advertisement would not appear again in that form.

A number of complaints were received about advertisements for genital deodorants, but these in the Authority's view related more to the acceptability or the very existence of the product than the nature of the advertising, which was felt to be within the bounds of decency.

47 Comparative advertising—Paragraph 2 of the Code

The change in the Code whereby comparative advertising was separated from denigration is beginning to be understood. It is important that the significance of both these aspects of advertising should be appreciated because they come within the ambit of European laws against unfair competition which have no counterpart in this country. That a mischief may exist is recognised by the Code, which is interpreted in such a way as to permit comparisons which are fair, while proscribing those which are not. Assessment of fairness is always a matter of subjective judgment and a good test of the control system is the extent to which advertisers and their agencies are prepared to be bound by decisions which go against them. It is worthy of note that every decision of the Authority has been respected. Of the 16 complaints made during the year, 11 were found to be justified and five not so.

48 Denigration—Paragraph 3 of the Code

The old "knocking copy" rule having been cleared away, that aspect of unfair competition is now judged by the criteria of denigration. These are the twin prongs of unfair attack and discrediting. Once again, the difficulty arises as to what is fair or unfair. Borderline cases are bounded on the one side by rights of competition and on the other by good manners. It is rarely easy to delimit these bounds in terms of black and white and one is left with the criterion of "honest practices in industrial or commercial matters", the phrase which is used in para (2) of Article 10 bis of the International Convention for the Protection of Industrial Property, known as the Paris Convention. Six complaints were made under the heading of denigration, four of which were upheld.

It is the view of the Authority that as complaints arising from comparative advertising or denigration are more in the nature of unfair competition between advertisers than of misleading the public, they are best dealt with by the C A P Committee. Advertisers and advertising agencies are therefore advised to address such complaints to the C A P Committee and not to the Advertising Standards Authority. The Authority will, of course, continue its role of watchdog and satisfy itself that the rules are being properly administered and that the interests of the public are being adequately served.

C. THE LAW AND THE COURTS

49 Trade Descriptions Act 1968

The last report of the Authority examined the first complete year's working of the Trade Descriptions Act. The findings and comments made in that report seem equally apposite today. The pattern of enforcement remains about the same, the areas of doubt and contention have not changed. Those cases which have gone to appeal to higher courts have been more on matters of administration and procedure than on the interpretation of words and phrases affecting the advertising industry.

There have been some cases where on the facts as reported it has been difficult to appreciate the rationale of the magistrates' decisions but usually these have been preceded by a plea of guilty. The Authority has already drawn attention to the results which might flow from the unwillingness of defendants to contest cases, even where important points of law are in doubt. If the Act is interpreted in magistrates' courts in ways which Parliament did not intend and if these interpretations are not tested in superior courts a somewhat lopsided view of the Act may develop. It is in nobody's interest that this should happen.

There have been very few prosecutions based on advertisements in display spaces in the press or on television. This bears out the prognostications of the Authority and its experience that there is remarkably little advertising which is so deceptive that it needs correction either under pressure of the Act or through the Code. The "grey" areas are more white than black.

The friendly liaison between the secretariat and the Trade Descriptions Committee of the Institute of Weights and Measures Administration does a great deal to harmonise the operation of statutory and self-disciplinary areas of control of misleading advertising. While there are bound to be differences of opinion from time to time, for the most part interpretations of what is misleading, whether or not to a material degree, run along similar lines.

In our last report the hope was expressed that a way might be found to devise a system whereby information as to the nature of prosecutions could be passed to the Authority and others who have to give legal and practical advice on the Trade Descriptions Act. Although this hope was not realised, sufficient information is coming through from various sources to provide the Authority with enough material to gauge the effectiveness of the working of the Act and the areas where action may be required on the part of the advertising control system. We are grateful to those members of the Newspaper Society who have submitted newspaper reports of cases to the C A P Committee.

50 Competitions

Consumer competitions have long been a favourite adjunct to the advertising of products, particularly in the fields of groceries and confectionery. So far as the Authority is concerned competitions pose problems in two main ways, first in terms of administration, where the complaints are much the same as

those made against premium offers—broadly the advertiser's failure to live up to his express or implied promises to the competitor—and secondly in legal terms, in view of the Code's requirement that all advertising must be legal. The Betting, Gaming and Lotteries Act 1963 makes all commercial lotteries and certain kinds of prize competitions illegal. Any distribution of prizes in which a potential prizewinner's own exertions or skill cannot give him any advantage as against other participants amounts on the face of it to a lottery and will, in appropriate circumstances, also be an illegal prize competition.

The requisite element of randomness or chance in these offences may be inherent in the nature of the promotion, as where bonus vouchers are concealed in some packs of a product but not in others, or may rest in the way in which the winner is selected, as where the prize in a competition requiring genuine skill (e.g. a crossword) is awarded to the first correct solution opened, and equally correct solutions are ignored.

So much has long been recognised and the Authority has applied this understanding of the law in its assessment of the acceptability of advertising for consumer competitors. However, many areas of uncertainty remained and outside the advertising industry the law has appeared for some years to have been broken as frequently as respected. For this reason there was great interest in two decisions of the Divisional Court in 1970 arising out of recent prosecutions. The first case, *Whitbread v. Bell*, concerned a competition in their public houses which its promoters admitted involved no real skill. They argued, however, that it was saved from being a lottery by the fact that the participants did not need to pay to enter—not even indirectly, by buying beer. This argument succeeded and thus the Court's decision settled a point which had long been in dispute, namely whether a lottery could exist in circumstances where there was no element of consideration or contribution from the prospective prize-winner. A much clearer line can now be drawn between the random distribution of gifts, which has never been considered a lottery, and the lottery itself. This clarification greatly eases the Authority's task in giving advice.

While winning on this point however, *Whitbread's* lost on the other point of the prosecution, that, contrary to section 47, in respect of which consideration is irrelevant, they had organised a commercial competition "success in which did not depend to a substantial extent on skill". Thus the case as a whole has vindicated the status of the Instant Winner beloved of promoters, but has underlined the fact that any competitive promotion which escapes being a lottery on the test of contribution, may well yet fall foul of s. 47.

The second case *Ladbroke v. Perrett* illustrates the pitfalls of another part of s. 47, that which makes it an offence to organise a commercial competition which involves forecasting the result of a future event (or of a past event where the result is not generally known). There is little doubt that what the legislature sought to prevent by this provision was the extension of a practice akin to betting, namely the forecasting of the results of horse races and football

matches (there is a special exclusion for football pools). In this case, however, the prosecution argued successfully that the wording of the section was apt to cover the facts of Ladbroke's "Spot-Ball" competition in which competitors were asked to say where the football was most likely to have been on a given match photograph from which the actual ball had been removed. Entries were judged with reference to the opinions of an expert team of judges who worked from the same data as the competitors. This, the court held, meant that in reality the competitors were attempting to forecast what the judges would decide (the result) on the occasion of their judging session (the future event). Since similar methods of judging, to which the same analysis could be applied, are used in many consumer competitions, this decision caused a good deal of concern. It is however apparent that problems need only arise where the judges' minds are not open to be influenced by the entries of the competitors: it is also clear that there are many legal forms of competition which do not involve judges in this particular way. Moreover, the concern which has been expressed by media owners about the effect of the Ladbroke decision on their own "Spot Ball" competitions, together with concern over the effects on charities of the adverse decision in the Cancer Football Pool case, has led the Government to announce that it is undertaking a thoroughgoing review of the whole subject of lotteries and competitions. This is an initiative which the Authority warmly welcomes. In the meantime a guidance paper is being prepared to amplify and bring up to date the advice given in the earlier paper "Mail-ins and Competitions" which is now out of print.

51 Unsolicited Goods and Services Bill

This Private Member's Bill was introduced in the House of Commons with the object of making the practice of sending unsolicited goods unprofitable, and therefore less likely to be engaged in, by allowing the recipient of such goods to treat them as a gift. The Bill also contains provisions which seek to curb the "directory racket", that is the practice of obtaining payment for entries or advertising space in trade directories which either fail to appear, or, if published, have inadequate circulation.

The Authority takes the view that, while the objectives of the Bill generally are unexceptionable—and that part dealing with directories is most welcome—there is a danger in the way in which the Bill is drafted of encouraging ill-disposed persons deliberately to set about acquiring goods by the misuse of its provisions. The Authority also has some reservations as to the appropriateness of Clause 4 of the Bill as a method of curbing the sending of unsolicited books and advertising material describing sexual techniques. It is as well that further consideration is being given to this subject by the Younger Committee on Privacy. The Bill was still going through its parliamentary stages when this report was written.*

*The Bill received the Royal Assent on 12th May 1971 and comes into force three months from that date.

D. INTERNATIONAL

52 The links between the Authority and self-disciplinary systems in other countries continue to grow. The report is circulated to an ever-widening international readership and the guidance papers are found to be of practical use in other countries. The Secretary has continued to represent the European Association of Advertising Agencies as an observer on the Council of Europe Working Party on Misleading Advertising and has worked closely with the British Government representative on that body.

The British self-disciplinary system and its relationship with the statutory control of television and the local government and government bodies responsible for the enforcement of various statutes and regulations affecting advertising is a model which is making its mark upon other countries. The European Association of Advertising Agencies has been making a series of presentations of a blue print for an advertising self-disciplinary control system and the Secretary of the Authority has been a key speaker. The conception of a tripartite, two-tier system which is put forward as a model, springs directly from the combination of advertisers, agencies and media, and the structure of the Advertising Standards Authority and the C A P Committee as they operate in this country. These presentations are already bearing fruit. The one made in Paris in March 1970 was largely instrumental in giving impetus to a reconstruction of the French Bureau de Verification de Publicité, which should result in a more effective system. Their new statutes were brought into force in November. The other presentations, given in Helsinki and Brussels, have given the advertising interests in the respective countries an incentive to look closely at their own control machinery.

The Authority has been following with interest the moves in the United States towards the introduction of some form of voluntary control system which will not conflict with the U.S. Anti-trust legislation. In February 1971 the Secretary accompanied Mr. John Hobson, the Chairman of the Advertising Association, on a visit to Washington, where they both spoke at the 13th Annual Government Affairs Conference of the American Advertising Federation, following up with talks in New York with bodies representing advertisers, agencies and media. The plan for a self-disciplinary system put forward by Mr. Victor Elting Jr., Chairman of the American Advertising Federation, is now under serious consideration. In pursuance of a study of the British system, Mr. John Crichton, the President of the American Association of Advertising Agencies, visited England and attended a meeting of the C A P Committee.

E. GUIDANCE

53 The advisory aspects of the Authority's work become increasingly important as the complexities of regulatory law extend. Advice is sought not only by those in the advertising industry but also by outside bodies and organisations whose experience of advertising is limited. Members of the legal

profession who do not have a knowledge of the finer points of advertising law call upon the A S A secretariat which is frequently able to shed light on some of the darker corners of specialised law. Guidance is an important ingredient in the self-disciplinary system and within the advertising industry operates primarily at two levels. The C A P secretariat is always prepared to advise on matters of principle and Code interpretation and the Advertising Investigation Department of the Advertising Association handles both interpretation queries and guidance on detailed copy matters relating to particular advertisements.

Mention has already been made of the guidance leaflets published by the Authority. The leaflet on premium offers and related consumer promotions has proved to be of great benefit to all those engaged in these activities.

MESSAGE FROM LORD DRUMALBYN

Having had the honour of being Chairman of the Authority for over five years, including half the year covered by the present report, I would like to express on behalf of my former colleagues our great gratitude to our staff. Our secretary, Mr John C. Braun, has acquired a well-deserved international reputation in legal and advertising circles. We all appreciate immensely their skill and diligence. But most of all we would acknowledge the spirit of helpfulness which animates them in all their work, and the integrity of their advice wherever and to whomever they are called upon to give it. I would record my own profound indebtedness to them all.

I would also pay tribute to Mr Allan E. Hickman, the Director of the Advertising Investigation Department of the Advertising Association, on whose vigilance, tact and firmness not only the Authority has long relied.

I acknowledge with real gratitude the willing co-operation that the Authority has received throughout my tenure of the chairmanship from the C A P Committee, the advertising industry, and in particular from Mr J. S. Williams, OBE, the Director-General of the Advertising Association.

In conclusion I would thank most warmly my colleagues in the Authority for their great kindness and support, and offer my best wishes to them under leadership of my successor, Lord Tweedsmuir.

THE MEMBERS OF THE AUTHORITY

THE RT. HON.
LORD TWEEDSMUIR,
C.B.E, C.D., LL.D.

Rector, Aberdeen University (1948-51).
Chairman, Joint East and Central African
Board (1950-52). President, Common-
wealth and British Empire Chambers of
Commerce (1954-57). Member of the
Board, BOAC (1955-64). President of
Institute of Export (1964-67). A Governor
of the Commonwealth Institute and of the
Ditchley Foundation. March 1971.*

A. CHARLES BUCK

Director, Reckitt & Sons Ltd. Former
President of Incorporated Society of
British Advertisers. Past President of
International Union of Advertisers Asso-
ciation. President of the International
Foundation for Research in Advertising.
July 1962.*

R. CRAIG-WOOD

Chairman of Computeraid Holdings Ltd.
and of Craig-Wood Consultants Ltd.
Director of Joseph Dawson (Holdings)
Ltd. Formerly Managing Director of
A.E.I.-Hotpoint Ltd. (1955-1963), Thomas
Hedley & Co. Ltd. (1947-54). Fellow of
British Institute of Management.

July 1962.*

LIONEL MURRAY

Assistant General Secretary of Trades
Union Congress. April 1970.*

MRS. JEAN FORT

Formerly Head Mistress of Roedean
School. September 1965.*

SIR JOHN HAWTON, K.C.B.

Chairman, British Waterways Board.
1963-1968 and Vice-Chairman since 1968.
Permanent Secretary, Ministry of Health
1951-1960. July 1962.*

*Date of appointment as member of the Authority

BRIAN F. MACCABE, M.C.

Chairman Foote, Cone & Belding Ltd.
Chairman F.C.B. International Inc.
Director F.C.B. Communications Inc.,
Fellow of Institute of Practitioners in
Advertising (President 1963-1965). Mem-
ber of Councils of I.P.A., and Inter-
national Marketing Programme. Member
of Reith Commission 1962-1966. Member
of Committee of Marketing Studies,
Ashridge. April 1969.*

MRS. G. L. S. PIKE,
C.B.E., J.P.

Chairman of the Women's Group on
Public Welfare. Formerly Chairman of
National Federation of Women's Insti-
tutes. Member of the Food Standards
Committee of the Ministry of Agriculture,
Fisheries and Food. Member of Indepen-
dent Television Authority's Advertising
Advisory Committee. September 1965.*

R. M. SHIELDS

Managing Director, Associated News-
papers Group Ltd. Director of Southern
Television Ltd. Managing Director,
Associated Investments Harmsworth Ltd.
and of Associated Developments Harms-
worth Ltd. Chairman National Opinion
Polls Ltd., of N.O.P. Market Research
Ltd. and of Market & Operation Research
International, Council Member of the
Advertising Association. April 1969.*

HOWARD THOMAS, C.B.E.

Managing Director, Thames Television
Ltd. Director, Independent Television
News Ltd. Divisional Director, EMI
Ltd. Director, EMI Film & Theatre
Corp. Ltd. July 1962.*

THE HON.
C. M. WOODHOUSE,
D.S.O., O.B.E., M.P.

M.P. for Oxford 1959-66 and since 1970.
Director of Education and Training,
Confederation of British Industry (1966-
70). Director-General, Royal Institute of
International Affairs (1955-59). Visiting
Fellow Nuffield College (1956-64). Parlia-
mentary Secretary, Ministry of Aviation
(1961-62). Joint Parliamentary Under-
Secretary of State, Home Office (1962-64).
March 1967.*

*Date of appointment as member of the Authority

Printed by S. Glossop & Sons Ltd., Ipswich Road, Roath, Cardiff CF3 7XX

PRICE — 25p